

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
(SOUTHERN DIVISION)**

In re:)	
)	
CITY OF DETROIT, MICHIGAN,)	CASE NO.: 13-53846
)	
Debtor.)	CHAPTER 9
)	
)	Hon. Steven W. Rhodes
)	

**CERTIFICATION OF WILLIAM W. KANNEL IN RESPONSE TO THE COURT’S
ORDER GRANTING MOTION TO COMPEL FULL CLAWBACK OF DEBTOR’S
DOCUMENT PRODUCTION AND RELATED RELIEF**

I, **WILLIAM W. KANNEL**, hereby certify as follows:

1. I am over the age of 18 and am an attorney with the law firm of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. (“Mintz Levin”), counsel for Fidelity Management & Research Company, Eaton Vance Management, and Franklin Advisers, Inc., as members of the Ad Hoc Bondholder Committee.

2. I make this certification pursuant to the Court’s May 13, 2014 Order Granting Motion to Compel Full Clawback of Debtor’s Document Production and Related Relief [Docket No. 4710] (the “Order”).

3. On May 7, 2014, Mintz Levin received a hard drive with a document production made by the City of Detroit (the “Production”).

4. On May 13, 2014, Mintz Levin mailed the Production by overnight courier to Jones Day at 51 Louisiana Avenue, N.W., Washington, DC 20001, Attn: Mary Hale. *See Eric R. Blythe Letter of May 13, 2014*, attached hereto as **Exhibit A**.

5. On May 14, 2014, Mintz Levin received confirmation of the overnight delivery service returning the Production to Jones Day. *See Tracking Confirmation*, attached hereto as **Exhibit B**.

6. Mintz Levin has complied with each of the provisions of paragraph 2 of the Order as follows:

- a. Neither Mintz Levin nor the members of the Ad Hoc Bondholder Committee it represents made any electronic copies of the Production or any portion thereof, and therefore no such copies exist in their possession.
- b. Neither Mintz Levin nor the members of the Ad Hoc Bondholder Committee it represents made any physical copies of the Production or any portion thereof, and therefore no such copies exist in their possession.
- c. Neither Mintz Levin nor the members of the Ad Hoc Bondholder Committee it represents created any work-product reflecting the contents of any document in the Production, and therefore no such work product exists in their possession.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the State of Massachusetts that the foregoing is true and correct. Executed on May 14, 2014, in Boston, Massachusetts.

/s/ William W. Kannel
William W. Kannel, Esq.
Adrienne K. Walker, Esq.
MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY and POPEO, P.C.
One Financial Center
Boston, MA 02111
Tel: 617-542-6000
Fax: 617-542-2241
wwkannel@mintz.com
awalker@mintz.com

*Attorneys for Fidelity Management &
Research Company, Eaton Vance
Management, and Franklin Advisers, Inc.,
Members of the Ad Hoc Bondholder
Committee*

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Certification was filed and served by the Court's electronic case filing and noticing system to all parties registered to receive electronic notices in this matter this the 14th day of May, 2014.

/s/ William W. Kannel

William W. Kannel, Esq.

Adrienne K. Walker, Esq.

MINTZ, LEVIN, COHN, FERRIS,
GLOVSKY and POPEO, P.C.

One Financial Center

Boston, MA 02111

Tel: 617-542-6000

Fax: 617-542-2241

wwkannel@mintz.com

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